

Exhibit A

u:KSC
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ORIGINAL

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JUL 11 2007

Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

at 2 o'clock and 55 min. PM
SUE BETIA, CLERK

FOR THE STATE OF HAWAII

ERNEST S. MAEMORI and LORETTA
JANE MAEMORI; ET AL;

Plaintiffs,

vs.

1. AIR LIQUIDE AMERICA
CORPORATION, a Delaware
corporation, individually and as
successor to BIG THREE
INDUSTRIES, INC.; ET AL;


Defendants.

) CIVIL NO. 07-00332 SPK KSC
)
) NOTICE OF MOTION;
) PLAINTIFFS' MOTION FOR REMAND TO
) STATE COURT; MEMORANDUM IN
) SUPPORT OF MOTION FOR REMAND
) TO STATE COURT; DECLARATION OF
) COUNSEL; EXHIBITS "A" THROUGH
) "D"; CERTIFICATE OF SERVICE
)
) DATE: _____
) TIME: _____
) JUDGE: _____

NOTICE OF MOTION

Notice is hereby given that Plaintiffs' Motion For Remand To State Court shall be heard
on _____, 2007 at _____ m. before the Honorable Judge
_____.

DATED: Honolulu, Hawaii, July 11, 2007.


JANICE P. KIM
Attorney for Plaintiffs

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IN THE UNITED STATES DISTRICT COURT

FOR THE STATE OF HAWAII

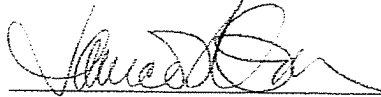
ERNEST S. MAEMORI and LORETTA)	CIVIL NO. 07-00332 SPK KSC
JANE MAEMORI; ET AL;)	
)	
Plaintiffs,)	PLAINTIFFS' MOTION FOR REMAND TO
)	STATE COURT; MEMORANDUM IN
vs.)	SUPPORT OF MOTION FOR REMAND
)	TO STATE COURT; DECLARATION OF
1. AIR LIQUIDE AMERICA)	COUNSEL; EXHIBITS "A" THROUGH
CORPORATION, a Delaware)	"D"; CERTIFICATE OF SERVICE
corporation, individually and as)	
successor to BIG THREE)	
INDUSTRIES, INC.; ET AL;)	DATE: _____
)	TIME: _____
Defendants.)	JUDGE: _____
_____)	

PLAINTIFFS' MOTION FOR REMAND TO STATE COURT

The matter before the Court concerns claims for strict products liability, negligence, conspiracy, and loss of consortium that were removed from Hawaii state court to federal court, and are currently pending transfer to the United States District Court for the Northern District of Ohio by the Judicial Panel on Multidistrict Litigation ("JPML"). Plaintiffs move now for remand of their cases to Hawaii state court for want of federal subject matter jurisdiction and/or lack of diversity.

This Motion is made pursuant to 28 U.S.C. §1447, Rule 7 of the Federal Rules of Civil Procedure, Rules 7 of the Local Rules of Practice for the United States District Court for the District of Hawaii, the Declaration of Counsel and the records and files herein.

DATED: Honolulu, Hawaii, July 11, 2007.

A handwritten signature in black ink, appearing to read 'Janice P. Kim', is written over a horizontal line.

JANICE P. KIM
Attorney for Plaintiffs